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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION
 11

12 JAMES MURRAY,

13 Plaintiff,

14 v.

15 UNITED STATES OF AMERICA,

16 Defendant.

) No. C 04-3707 MMC
) **E-FILING CASE**

) **STIPULATION AND ~~PROPOSED~~ ORDER**
) **EXTENDING EXPERT DISCLOSURE AND**
) **DISCOVERY**

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 19 The parties hereby stipulate and respectfully request the Court to order that the expert
 20 disclosure date in this case be extended for 60 days, from the current expert disclosure date of
 21 August 26, 2005 to October 25, 2005. The expert discovery deadline would be extended from
 22 October 7, 2005 to December 6, 2005. The reason for this stipulation is that defendant received
 23 initial fact discovery from plaintiff during the last week of July, 2005, and will not take plaintiff's
 24 deposition until August 30. Defendant is now receiving responses to subpoenas for medical
 25 records that an expert would have to review to write a report. A medical examination of plaintiff
 26 has not yet been scheduled. Plaintiff's initial disclosure has not yet been made.

1 This extension will not affect any other deadlines in this case.

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3 DATED: August 19, 2005

So stipulated and respectfully submitted,

4 KEVIN V. RYAN
United States Attorney

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7 /s/
OWEN P. MARTIKAN
Assistant United States Attorney
8 Attorneys for Defendant

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10 LAW OFFICES OF C.L. KECK


11
12 /s/
MICHAEL S. KECK

13 Attorneys for Plaintiff

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15 ~~[PROPOSED]~~ ORDER ON STIPULATION

16 Pursuant to stipulation and for good cause shown, it is hereby ordered that the deadline for
17 expert disclosures in this case is extended until October 25, 2005, and the deadline for the
18 completion of expert discovery in this case is extended until December 6, 2005.

19 Dated: August 19, 2005

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22 HON. MAXINE M. CHESNEY
United States District Judge